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August 28, 2020

VIA ECF

Honorable Robert W. Lehrburger
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: U.S. v. Hu, No. 20-cr-00360 (AKH)

Dear Judge Lehrburger:

We represent Defendant David Hu in the above-referenced action, and write to respectfully request an additional three week extension of the deadline set forth in Your Honor's July 17, 2020 Bail Disposition order (ECF No. 6) for Mr. Hu to complete the process of securing his bail bond with a mortgage for his home in West Orange, New Jersey. Counsel for the United States has no objection to this request.

Your Honor's order set the deadline for Mr. Hu to secure his bail bond for August 7, 2020. We wrote the Court on August 7 seeking an extension of that deadline until August 28. (ECF No. 11.) As set forth in our prior letter, that extension was necessary because Mr. Hu was required to submit the executed documents establishing that security interest to the Essex County Register of Deeds and Mortgages in Essex County, New Jersey by mail, rather than in person, due to the COVID-19 public health emergency. The need to file those documents by mail caused a delay in the time required to obtain as-filed copies demonstrating that the security interest has been recorded, which we intend to provide as soon as they are received.

Although Mr. Hu's counsel was informed on August 26 by the Clerk of the Essex County Register for Deeds and Mortgages that the mortgage and Affidavit to Authorize Judgment have been officially recorded, we still have not received the as-filed copies of those documents. Further, Mr. Hu's counsel was advised by the Clerk that it may take another week for those documents to be mailed and that it was not possible to send copies via fax or email. Accordingly, we hereby respectfully request an additional extension of the deadline for up to

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three weeks, until September 18, 2020, to allow sufficient time for those documents to be delivered via mail. We will provide them as soon as we receive them.

Respectfully Submitted,

/s/ Barry A. Bohrer

cc: Counsel of record (via ECF)